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Wednesday, November 16, 2016 at 16:17:48 H

By E-mail only to FOIA@oig.doc.gov

Department of Commerce
OIG Office of Counsel
Attn: FOIA Officer Raman Santra
1401 Constitution Avenue, NW
Room 7898C
Washington DC 20230
Phone: (202) 482 5992
E-mail: FOIA@oig.doc.gov

RE: "New Freedom of Information Act Request **DoC FOIA 85 XXXXXXXXXV**".

Dear Mr. Raman Santra;

This is a new Freedom of Information Act disclosure request under the Freedom of Information Act, [5 U.S.C. § 552](#) as currently amended. I am requesting electronic copies of the following documents that can be delivered *via* my E-mail address *above*, drdbkarron@gmail.com. There is no need for follow-up copies in paper. Please use the above reference Roman Numeral serial reference **DoC FOIA 85 XXXXXXXXXV** as well as your assigned reference number in all future correspondence regarding this particular request. Should there be any costs in excess of fifty (50) dollars, to fill this request, we will negotiate a restatement or narrowing of the scope of the request to eliminate excessive costs to search or copy records. An overarching declaration and documentation of my identity are on file with your office as specified in [Title 15, Subtitle A, Part 4 Subpart A §4.4 Requirements for making requests](#)

This is a request for an inventory of computer disks made for the prosecution and defense in the case [USA-v-KARRON-07-CR-541-RPP](#) paid by KARRON. The original prosecutor was now former Assistant United States Attorney Chi T. Steve KWOK.

The copies were made by the court's order.

A NEW FOIA request has also been made to the By E-mail only to USAEO.FOIA.Requests@usdoj.gov

Ms. Susan B. Gerson,
Acting Assistant Director
FOIA/Privacy Unit
Executive Office for United States Attorneys
Department of Justice
Room 7300, 600 E Street, N.W.
Washington, DC 20530-0001
Phone: (202) 252-6020
Email: USAEO.FOIA.Requests@usdoj.gov

The request is also being made with your office. You may want to coordinate who has better access to the case archives with the USAEO FOIA officer.

BACKGROUND

In June 2007, now disgraced former Department of Commerce Office of Inspector General Rachel ONDRIK nee GARRISON [executed a seizure warrant](#) against KARRON and [seized](#) all of KARRON's computers, personal, corporate and government related.

In the fall/winter of 2007, those computers were housed at the Department of Commerce Office of Inspector General Computer Crime Lab in the Hoover Building in Washington DC. By stipulation of the court, KARRON paid 30,000 cover costs for the prosecution to make a forensically clean and admissible copy of the business computer system by Art EUHAN and his technicians. Over that winter two sets of copies were made, a set of the file system split up and copied onto 10 each one terabyte disk drives, for the Defense, and another copy was made onto 500-gigabyte drives, purchased by KWOK for the government which we can

assume numbered some 20 drives total.

The existence or non-existence of exculpatory information on the government's copy of KARRON's records can be established by reviewing the government's copy of this data.

Should exculpatory information be present on these drives it was the obligation of the government to advise the defense of this fact. At trial, there was no evidence provided from these drives. KWOK, during the trial and in pre-trial hearing dismissed "pawing through all that material". Almost all trial evidence was obtained from the prosecution's star witness KARRON's former accountant Joan HAYES, CPA.

It has recently come to the attention of the Defendant and Counsel that Joan HAYES, CPA was the author of extremely material exculpatory documents and exculpatory information. Had the trial jury been aware of this information no competent juror on the panel would have returned a guilty vote. This information has been confirmed by an unimpeachable subject matter expert.

If the drives were destroyed, that is important information that needs to be verified. If the drives were destroyed, the defense may make the adverse assumption that the drives were destroyed because they contained exculpatory documents that could have vitiated the prosecution's case against KARRON.

If the drives exist in the case archives, because of their age, special techniques will be required to recover the information on the disk platters. The drives must be treated with extreme care because of their age.

REQUEST 1:

An inventory of the computer disks in possession of the prosecution in connection with [USA-v-KARRON-07-CR-541-RPP](#). Pictures and or inventory log is acceptable evidence from the DoJ case archives.

REQUEST 2:

Invoices, progress notes, and proof of payments(canceled to ART EUHAN and FIRST DATA or DATA FIRST as a DoJ contractor for the forensic copying of KARRON's computers

Signed,

A handwritten signature in black ink, appearing to read "D B Karron". The signature is stylized with a large "D" and "B" followed by the name "Karron".

D B Karron, Ph.D.
Requester